

Creating a Clean, Affordable and Resilient Energy Future for the Commonwealth



COMMONWEALTH OF MASSACHUSETTS

Charles D. Baker, Governor
Karyn E. Polito, Lt. Governor
Matthew A. Beaton, Secretary
Judith Judson, Commissioner

2015 MA RPS & APS Compliance Filing Webinar

June 8, 2016

RPS & APS
Compliance
Webinar

June 8, 2016

Howard Bernstein, RPS & APS Program Manager
Kaitlin Kelly, Solar Carve-Out Program Coordinator
Mike Judge, Renewables & Alternative Energy
Division Director

Review of Filing Process

- 2013 & 2014 banked totals provided on April 29th
- Retail Load Obligations provided on May 6th
- End of 2015 trading year is June 15th
- Alternative Compliance Payments (ACPs) must be submitted to the Massachusetts Clean Energy Center by June 24th
- Compliance filings due no later than Friday, July 1st
- Filers must provide *both* electronic and hard copies of filing
- Electronic copies must be submitted to DOER.RPS@state.ma.us

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Review of Applicable 2015 Compliance Exemptions & Variations

- Solar Carve-Out Pre-2010 ACP Rate Exemption
 - Not an outright compliance exemption
 - Exempts all load served under contracts executed prior to 1/1/2010 from paying full SREC ACP Rate
 - Allows for compliance to be met by paying RPS Class I rate
 - For competitive retail suppliers only
 - Suppliers cannot both make ACPs at Class I rate *and* bank SRECs
- Solar Carve-Out Minimum Standard (%) Bifurcation
 - Minimum Standard % depends on Contract dates
 - Load under pre-6/28/13 contracts has 1.5359% Minimum Std
 - Load under later contracts has 2.1442% Minimum Std
 - For all suppliers
- Pre-4/25/14 Compliance Exemption for Solar Carve-Out II
 - Exempts all load served under retail contracts executed before 4/25/2014
 - For competitive retail suppliers only

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Compliance Strategies and Best Practices

- Auction [Re-minted] SRECs
 - 2012 Auction SRECs *must* be used for 2015 compliance.
 - 2013 Auction SRECs can be used for 2015 and 2016.
 - 2014 Auction SRECs can be used for 2015 and 2016.
 - Based on the current market, it appears that SRECs & Auction SRECs may have more value if used for compliance in 2015 than in 2016.
 - Auction SRECs for use in 2016 should remain in your main GIS account or your Banked account, *not* in your state-specific subaccount.

	Compliance Year →	CY 2013	CY 2014	CY 2015	CY 2016	CY 2017
SREC Vintage	2012	Yes	Yes	Yes	No	No
	2013	No	Yes	Yes	Yes	No
	2014	No	No	Yes	Yes	No

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Compliance Strategies and Best Practices

- Banking certificates
 - DOER recommends that suppliers avail themselves of their ability to bank certificates whenever possible
 - Banking limits are expressed as a percentage of a supplier's 2015 compliance obligation
 - Banked certificates can be used in one of the following two compliance years
 - Banking limits are as follows for specific classes:
 - RPS Class I – 30%
 - SREC I and SREC II – 10%
 - RPS Class II Renewable – 30%
 - RPS Class II Waste-to-Energy – 0% (for 2014 and 2015 only)
 - APS – 30%
- Settle all certificates in MA subaccounts at GIS before June 15th
 - Errant certificates create accounting issues and make it difficult to reconcile numbers
 - DOER requests that all suppliers settle certificates before the close of the trading year

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ACP Payments

- ACP Payments must be made to the Massachusetts Clean Energy Center (MassCEC) by June 24th.
- To obtain wire instructions and ACP Notification forms, contact Sarah Hawrylak at (617) 315-9344 or Shawrylak@MassCEC.com.
- You must itemize your payments according to the different types of ACPs:
 - Class I (RECs)
 - Class I Solar Carve-Out (SRECs) at the Class I rate
 - Class I Solar Carve-Out (SRECs) at the SREC rate
 - Class I Solar Carve-Out II (SREC IIs)
 - Class II Renewable Energy (Class II RECs)
 - Class II Waste-to-Energy (WECs)
 - Alternative Portfolio Standard (AECs)
- The MassCEC will provide an ACP Receipt for each type of ACP that you remit.
- ACP Receipts must be included as part of your filing.
- If you have not received ACP Receipts by July 1st, you should *not* delay email submission of your Compliance Filing. Instead, email the Filing on time, and then email the ACP Receipts as soon as you receive them.

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2015 SREC Auction(s)

- The 2015 SREC Auction will be held before the end of July
- DOER expects to have significant auction volume in SREC II, but does not expect an SREC I auction to be held
- All deposits into the auction account must be made by June 15th
- Bidders will need to register by submitting a qualification form to DOER's auction agent
- DOER expects considerable bidder interest and strongly encourages all retail suppliers to actively participate in this year's auction
- Represents a significant opportunity for suppliers to reduce their future compliance costs



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Links & Contacts

- [Annual Compliance Filing Forms and Guidelines](http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/rps-aps/retail-electric-supplier-compliance/annual-compliance-filing-forms-and-guidelines.html) webpage for the Compliance Workbook, Instructions, Cover Email, and Guidelines:
<http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/rps-aps/retail-electric-supplier-compliance/annual-compliance-filing-forms-and-guidelines.html>.
- Assistance:
 - Howard Bernstein: howard.bernstein@state.ma.us, 617-626-7355
 - Kaitlin Kelly: kaitlin.kelly@state.ma.us, 617-626-7343
 - Mike Judge: michael.judge@state.ma.us
- General Program Info: www.mass.gov/energy/rps



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